



Nez Perce

TRIBAL EXECUTIVE COMMITTEE

P.O. Box 305 • LAPWAI, IDAHO 83540 • (208) 843-2253

R10-21-A-010

Narrative Information Sheet

1. Applicant Identification: Nez Perce Tribe
P.O. Box 365
Lapwai, Idaho 83540
2. Funding Requested
 - a. Assessment Grant Type: Community-wide
 - b. Federal Funds Requested:
 - i. \$300,000
 - ii. Not Applicable (Site-specific funding waiver)
3. Location: All lands within the external boundaries of the Nez Perce Indian Reservation.
4. Property Information for Site-Specific Applications: Not Applicable
5. Contacts
 - a. Project Director
John Loffredo, Tribal Response Program Coordinator
Nez Perce Tribe – Water Resources Division
P.O. Box 365, Lapwai, Idaho 83540
Phone: (208) 621-3888
Email: JohnL@nezperce.org
 - b. Chief Executive
Shannon Wheeler, Chairman – Nez Perce Tribal Executive Committee (NPTEC)
P.O. Box 305, Lapwai, Idaho 83540
Phone: (208) 843-7342
Email: NPTEC@nezperce.org
6. Population

18,770 people reside on the Nez Perce Reservation. Approximately 1,800 of our residents are tribal members, and an additional approximately 1,700 tribal members live off the Reservation. Non-member population on the Reservation is approximately 16,970 persons.

7. Other Factors Checklist

Other Factors	Page #
Community population is 10,000 or less.	4 (all towns with priority sites have less than 3,200 persons)
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	1-10 (Nez Perce Tribe is the applicant)
The priority brownfield site(s) is impacted by mine-scarred land.	2 (Howell Site)
The priority site(s) is adjacent to a body of water.	1, 2, 4 (Spalding Mill, Blue North Mill, and TU-45 former mill are on the Clearwater River)
The priority site(s) is in a federally designated flood plain.	2 (part of Blue North Mill)
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	2, 3, 5 (Blue North Mill and Fort Lapwai have solar energy in proposed reuse)
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	Not Applicable

Additional Consideration	Summary
Fair distribution of funds between urban and non-urban areas	Target area consists entirely of small rural communities.
Whether the applicant's jurisdiction is located within, or includes, a county experiencing "persistent poverty" [see guidelines definition].	N/A. The town of Ft. Lapwai, with the densest population of American Indian residents (81%) in our target area, does have high poverty rates (21% overall, 26% for families with children).
Distribution of funds among EPA's ten Regions	Region 10 had the second-lowest number of awards in FY2020. Idaho had no awards.
Whether the applicant's project is located in an IRS-designated Opportunity Zone	Yes. Our eastern-most census tracts are Opportunity Zones and have priority sites.

8. Letter from the State or Tribal Environmental Authority

The applicant, the Nez Perce Tribe, is the Tribal Environmental Authority and the attached letter from the Natural Resources Department Director reflects the Environmental Authority endorsement of this proposal. We acknowledge that we plan to conduct assessment activities and are applying for FY21 federal brownfields assessment grant funds.

Sincerely,



Mr. Shannon Wheeler, Chairman

Section IV.E. Attachments

Letter of Support



STATE OF IDAHO

DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, ID 83706 • (208) 373-0502 Brad Little, Governor www.deq.idaho.gov Jess Byrne, Director

October 22, 2020

Mr. Shannon Wheeler
Chairman Nez Perce Tribe
P.O. Box 305
Lapwai, ID 83540

This letter acknowledges that the Nez Perce Tribe (Tribe) notified the Idaho Department of Environmental Quality (DEQ), the designated State Environmental Authority that the Tribe is submitting to the U. S. Environmental Protection Agency (EPA) a Brownfields Community-wide Assessment Grant application for assessment and reuse planning of six priority sites along the 74-mile Clearwater River corridor Target Area between the eastern and western boundaries of the 1863 Reservation.

The Tribe informed DEQ that the Tribe qualifies as an eligible entity. The Tribe is applying to EPA for Brownfields Community-wide Assessment Grant funds for the assessment of six hazardous substance impacted, blighted, and otherwise underused properties in the amount of \$300,000. The Tribe's notification to DEQ satisfies Threshold Criterion C of the EPA 2020 Proposal Guidelines for Brownfields Assessment Grants (EPA-OLEMOBLR-19-05).

Not only is the State informed of the Tribe's intent to apply for federal funding, the State is very supportive of these efforts to foster and promote rural redevelopment on the Reservation. The Nez Perce Tribe has conducted a brownfields inventory of potential sites and has identified six priority sites to address with this assessment grant.

The State looks forward to working with the Tribe.

Regards,

A handwritten signature in black ink, appearing to read "Eric Traynor", with a long horizontal flourish extending to the right.

Eric Traynor
Idaho Brownfields Program Manager Idaho
Department of Environmental Quality
Phone: (208) 373-0565
Email: eric.traynor@deg.idaho.gov



September 11, 2020

Jessica Durand
USEPA Headquarters
William Jefferson Clinton Building
1200 Pennsylvania Ave., N.W.
Mail Code: 3903R
Washington, D.C. 20460

CC: John Loffredo
Brownfields TRP Coordinator
Nez Perce Tribe
Water Resources Division
120 Beaver Grade, PO Box 365
Lapwai, ID 83540

RE: Grant Proposal for FY21 EPA Community-wide Assessment Grant;
EPA-OLEM-OBLR-20-06

Dear Ms. Durand,

As the Nez Perce Tribe's (Tribe) executive level manager for the Department of Natural Resources (DNR) and Tribal Environmental Authority, I am submitting this letter of support on behalf of our Water Resources Division and the Brownfields Tribal Response Program Coordinator, John Loffredo. I fully endorse the Division's proposal for the FY21 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(k) Community-wide Assessment Grant that will assess environmental risks, plan cleanup activities, and facilitate redevelopment at inventoried brownfield sites across the reservation.

By working collaboratively within the Tribe's redevelopment planning framework across Tribal Government, Tribal Enterprises, and the Executive Committee the cleanup and redevelopment of these properties will help to achieve the Tribe's goal of enhancing health and welfare for Tribal members, and allow the Tribe to exercise its inherent sovereignty over its Tribal territory, exercise its inherent right to stimulate its economy, and create jobs.

As the DNR Manager, I support John's application. If you have any questions or comments, please feel free to contact me at 2moon@nezperce.org or at 208-843-2253. Thank you for your consideration.

Sincerely,

Aaron D. Miles Sr., Manager
Department of Natural Resources

IV.E.1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area: The Nez Perce Tribe (NPT) requests a 3-yr, \$300,000 community-wide assessment grant to help accelerate redevelopment of our priority brownfields sites. Our Reservation is on land known to the Nimiipuu (or Nez Perce people) since time immemorial. In fact, our people's origin story centers on a basalt outcrop upstream of one of our largest brownfield sites, located on the Clearwater River. The Lewis & Clark expedition used the Clearwater River, now designated as Wild & Scenic, as the most efficient route westward out of the Rocky Mountains in 1805, and stayed with our ancestors on what is now the Blue North Mill waiting for spring during their return east. In the 1860's, gold was discovered on tributaries of the Clearwater River. In quick succession, our original history of self-determination closed with an 1,100-mile escape on foot and horseback in 1877. The journey ended with the surrender of Chief Joseph only 40 miles from the Canadian Border, while traveling with families young and old, facing both starvation and freezing conditions. Following surrender, we faced a difficult time of assimilation, under watch by troops stationed at Fort Lapwai and religious missionaries at Spalding Mission. Our children were placed in boarding schools and were beaten if they spoke our native language. The Fort Lapwai hospital had frequent tuberculosis outbreaks and a poor survival rate. Eventually, we lost ownership and control of a majority of the land within the external boundaries of our own Reservation, and during industrialization of the 1900's, our Tribe as a nation was largely sidelined.

During the industrialization period, the Clearwater River served as the lifeblood of commerce in our area. As the primary hydrologic feature on the Reservation, the river basin drains 9,645 square miles of forested mountains and western margins of the Columbia Plateau between the continental divide at the Montana/Idaho border to the confluence with the Snake River at Lewiston, Idaho. In its lower reaches, the Clearwater River was the collection point for logs, which were then delivered by barge or rail to coastal markets. Multiple pulp and lumber mills were constructed on the river, and we experienced a natural resource extraction boom up until the 1980's. From the mid-1980's until now, the timber industry in the Northern Rockies has declined, leaving brownfield sites in its wake.

As the timber industry declined, we began to reassert our desire for self-determination as a Tribal Nation. The Snake River Basin Adjudication (SRBA) water rights process, which began in 1987 and concluded with a significant settlement for our people in 2014, is emblematic of this transition. We created a for-profit arm called Tribal Enterprises that started with one gas station and now has six diverse facilities, and we are gradually buying back land to reach majority land ownership within our Reservation. A steady manufacturing community connected to interstate rail and highway commerce on the western margin of our Reservation provides additional hope for redevelopment along the Clearwater River corridor Target Area, which extends 74 river miles, along U.S. Highway 12, from the eastern Reservation boundary near Kooskia, Idaho to the western Reservation boundary near Lewiston, Idaho (see Figure 1 in Section IV.E. Attachments). The two census tracts that form the mountainous eastern edge of our Reservation are now poverty-prone Opportunity Zones (census tracts 16035940000 and 16049940000). The Fort Lapwai complex has become dilapidated and filled with mold, and nearly all the area's mills have closed, leaving behind abandoned, partially burned and vandalized buildings at Kamiah bend (Blue North Mill). The proposed activities discussed below support EPA FY18–22 Strategic Plan, Goal 1 – A Cleaner, Healthier Environment; and Objective 3 – Revitalize Land and Prevent Contamination.

ii. Description of the Priority Brownfield Site(s): Our Tribe has identified and inventoried brownfields sites. We have had a Brownfields Tribal Response Program (TRP) for 15 years and have created a short list of six priority sites, organized by tiers of need (base level: due diligence, mid-level: cleanup planning, top tier: redevelopment planning). These sites are along the Clearwater River corridor Target Area, and half of them are former timber mills (see table below). We are confident that we can address the priority sites with an Assessment grant, because all but two (Husky Sports and Howell Site) have already been deemed brownfields eligible, and our Executive Director, who has a background in architecture and site

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planning, was recruited specifically to help guide brownfields redevelopment. Should additional sites be needed, we have 31 other sites on the brownfields inventory, and 209 other sites on our list of Properties of Concern.

Priority Site	Past Land Use and Current Conditions	Potential Environmental Concerns	Proposed Redevelopment
Base Tier Sites (Initial Phase I and/or II ESA needed)			
Husky Sports (Orofino)	Past: Fueling station Current: Closed fueling station	Hazardous building materials, petroleum	Casino operated by Tribal Enterprises
Howell Site (wildlife corridor)	Past: Narrow valley, raptor habitat Current: Junk cars, gravel mine	Petroleum or metals in surface soil	Reclaimed wildlife habitat
Spalding Mill (hwy. junction)	Past: Lumber mill 1940 to 1980's Current: Railcar cleaning, junk cars	Petroleum or metals in junk car/rail area	Jet Boat manufacturing and testing site
Middle Tier Sites (Supplemental Sampling and Cleanup Planning is the next step)			
Blue North Mill (114-acres of riverfront)	Past: Lumber mill from 1940's Current: Unused since 2017, partially deconstructed, extensive damage from fire and vandalism	Asbestos (known, extensive), potential petroleum and PCB impacts	Hemp textile and bottled water business, Pedestrian access, Solar energy production
Fort Lapwai (dilapidated, outdated; slated for renewal)	Past: Military fort, boarding school, tuberculosis hospital Current: Blighted unoccupied buildings	Asbestos, lead-based paint (known, extensive), damaged water wells	Integrated social services and government center (complete demolition and rebuild)
Top Tier Sites (Redevelopment Planning is the next step)			
TU-45 (riverfront near community center)	Past: Sawmill from 1943 to 1980, asphalt dumping, fireworks stand Current: Informal walking paths for adjacent government buildings	Creosote in western area of site near Hwy. 12, Delineated perchlorate plume	Tourist-oriented cabins and gifts, river access, walking trails

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans: With brownfields funds, we will repurpose our largest mill properties (Spalding, Blue North Mill, TU-45), connect to the tourism economy (Husky Sports), reclaim key wildlife property (Howell Site), and serve Lapwai with a new government and social services center (Fort Lapwai redesign, led by our new Executive Director). Four of these projects involve creation of new businesses and jobs, one is greenspace, and the other exemplifies our progress toward self-determination by removing dilapidated Fort Lapwai and replacing it with new government facilities. Husky Sports, purchased in 2018, followed the Tribe's *Land Acquisition Plan*, with the mission to identify and evaluate properties for consideration of purchase that will increase the Tribe's economic, social, and cultural opportunities. Reuse plans at Husky Sports also align with Clearwater County's *Economic Development Plan*, that facilitates proactive partnerships to foster thriving businesses countywide. Our Tribe currently operates two casinos. Creating another would make sense in Orofino, (Clearwater County seat) because it is a tourist town with excellent business opportunities related to river recreation and motor sports along the Wild & Scenic river corridor. The stretch of U.S. Highway 12 through Orofino is ranked as the #1 Motorcycle Ride in Idaho by motorcycleroads.com, and there are ample fly-fishing opportunities for steelhead and Chinook salmon throughout the Clearwater River corridor Target Area. The Howell Site will be improved for wildlife habitat, as designated in the Tribe's *Integrated Resource Management Plan* approved by the Bureau of Indian Affairs (BIA) which is a comprehensive, strategic, and programmatic planning document that guides the Tribe's natural and cultural resource management activities. At Spalding Mill, we commissioned a Preliminary Engineering Report (PER) in 2018 to support conversion of the mill to a new manufacturing center. We are negotiating with SJX Jet Boats, Inc. to expand onto this site, which has river access and rail near the intersection of U.S. Highways 12 and 95.

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Blue North Mill is slated for multi-use redevelopment, including a pedestrian path across the rail bridge to the town of Kamiah, repurposing the waterfront with a hemp textile and bottled water plant, and Avista (electric utility co.)-connected and tribally-owned solar generation facility to power the new businesses. Solar development is also proposed for renewal in the Fort Lapwai area. Nez Perce Tribal Executive Committee (NPTEC) Resolution NP20-085 (November 2019) designates the *Facilities Planning Committee* to identify layout, building sizes, infrastructure needs, traffic issues, and energy conservation and traditional Nimiipuu design elements in redevelopment of Fort Lapwai. In preparation to install solar on the Pi-Nee-Waus Community building in Lapwai fall 2020, the Tribe is sponsoring a solar install training course for 40 tribal members with RevoluSun, a company that has performed over 8,000 solar installations in three states. This Tribal workforce will be utilized to install and maintain solar infrastructure at both the proposed new government complex at Fort Lapwai and the Blue North Mill project sites. Finally, at TU-45, we will update the *Site Reuse Vision* produced in 2015 by initiating a collaboration between our Brownfields TRP, the University of Idaho Architecture Department, and tribal stakeholders, in order to develop a current vision for revitalization of the site. These projects align with our Brownfields Program's goal of transitioning beyond small scale, piecemeal assessment toward larger redevelopment-focused brownfields initiatives. Furthermore, these projected reuses align with the 2016 NPTEC *Strategic Action Plan's* stated goal to promote Tribal self-sufficiency through responsible investment, business development, and dynamic management of Tribal resources and entities.

ii. Outcomes and Benefits of Reuse Strategy: Our Tribe's 2016 *Strategic Action Plan* promotes a balanced reuse strategy on brownfield sites to bring economic redevelopment to our eastern Opportunity Zones (Blue North Mill, TU-45, and Husky Sports sites), facilitate manufacturing on the western tip of the Reservation (Spalding Mill site), preserve key greenspace (Howell Site), and consolidate Tribal Government operations at Fort Lapwai. Fort Lapwai renewal will provide approximately 40 jobs during construction and solar panel installation expertise to tribal members. The government complex is a 250,000 ft² project, with a 25,000 ft² main building that will house 300 Tribal Government employees including NPTEC elected representatives, the appointed Executive Director of Tribal Government, and personnel from our 12 government departments.

At Blue North Mill, there is infrastructure to allow for sustainable reuse, including paved roads, Avista transmission lines, and large reusable buildings, including the 27,664 ft² former lumber distribution building with rail access and 43,500 ft² steel-framed former Cooling Shed. In 2020, Heritage Timber (a building salvage firm) determined net salvage value associated with saving large beams and other historical wood features in other buildings, and we factor this into our building reuse plans. Repurposed buildings will be abated for hazardous building materials, protecting public health from friable asbestos reaching the atmosphere and lead-based paint leaching to groundwater. A hemp textile and bottled water plant, trail to the Kamiah community across the rail bridge, and solar array installation and maintenance will create up to 100 new jobs at the abandoned mill, facilitate renewable energy, and reclaim Tribal access to a property with rich cultural history.

c. **Strategy for Leveraging Resources**

i. Resources Needed for Site Reuse: Resources our Tribe will draw on for brownfields redevelopment include Snake River Basin Adjudication (SRBA) funds, income from Tribal Enterprise businesses, and BIA water supply funding. Each of these is discussed below.

Established in 2014, the SRBA has \$75 million in principal earmarked for the NPT. The fund compensates us for water rights lost during the adjudication. The funds are managed by NPTEC, and interest from the fund is used to support department requests. Our Water Resources Division has accessed these funds on past projects to conduct riparian restoration and infrastructure improvements in flood-prone areas. We anticipate that after assessment and cleanup planning, SRBA funding would be used by the Brownfields TRP for riparian restoration and trails work at Blue North Mill, and for development of water supply at Spalding Mill and TU-45.

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Tribal Enterprises generates income from two casinos, two gas stations, a hot springs resort, and a golf club. Last year, Enterprises' gaming revenue was \$4.8 million. This funding is used for everything from veteran's and senior's programs to solid waste management, operations and maintenance of Enterprises facilities, and our education department. Tribal Enterprises has performed multiple brownfields site visits in 2020 and is committed to brownfields redevelopment. Likely Tribal Enterprise investments include infrastructure to support jet boat manufacturing at the Spalding Mill site, and creation of a 7th Enterprises facility (a casino) at the Husky Sports site in Orofino. At Fort Lapwai, the water system alternatives evaluation to be performed under the Assessment grant will allow us to influence how BIA allocates the remaining \$750,000 in funding earmarked for the Fort Lapwai water supply project.

ii. Use of Existing Infrastructure: The Assessment grant would facilitate reuse of large industrial buildings at Blue North Mill, including the 43,500 ft², 30-foot-tall Cooling Shed and additional large wooden buildings, one with rail access. Existing electrical infrastructure and water rights for up to 50,000 acre-feet per year from the Clearwater River (per the 2007 SRBA Consent Decree), will be used for the hemp textile and bottled water business, and an ornate out-of-use rail bridge across the river to the town of Kamiah will be reused for a 1-mile pedestrian access path to the 114-acre revitalized site. At Spalding Mill, assessment and cleanup planning related to small, blighted areas (junk vehicles at the entrance house, unknown fill on the western end) will help attract business to the 60-acre site. This site has excellent access to U.S. Highways 12 and 95, as well as to rail and the Clearwater River. Husky Sports, now idle, will be reused as a casino, providing up to 30 jobs, after testing for hazardous building materials and subsurface fuel impacts. The site is served by public water and sewer and is centrally located in the tourist town of Orofino on U.S. Highway 12. Reuse planning at TU-45 will stimulate reuse of the site's 40 acres, and leverage the site's highway and river access. The Howell Site has 87 acres of natural "infrastructure" (habitat features for raptors) that will be reused as greenspace after confirming whether junk vehicles have caused contamination. Finally, and as mentioned above, Fort Lapwai has an inadequate water system, but BIA resources will upgrade the system as part of the overall renewal effort.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding: Our Reservation has low population and our residents have low incomes, which directly impacts funds available to address contaminated properties. The population of the Reservation is less than 19,000 people on nearly 1,200 square miles of land (less than 16 people per square mile). Our three largest towns, which are where our priority sites are located, have populations of 1,305 in Lapwai, 1,249 in Kamiah, and 3,111 in Orofino. Few of our communities are incorporated, and resources for community infrastructure and business attraction are severely limited, much less for environmental assessment and cleanup work. In addition, the cost of assessment and cleanup of contaminated properties on the Reservation often far exceeds the land values and potential profit on development projects, which in turn, stymies reinvestment. Therefore, an Assessment grant for our Tribe is vital to move our sites toward cleanup and redevelopment.

Median household income on the Reservation is \$42,123, which is lower than the median for Idaho, the Nation, and surrounding counties. There are high rates of families living in poverty in the two towns with our largest tribal populations (25.9% poverty in Lapwai, and 26.5 % in Kamiah). Real estate values are also low, with median home price of only \$154,296 in Lewis County, which is less than half the Idaho median. Low population, low incomes, and low land values make initial investment in brownfields difficult, and the Assessment grant will fill an unmet need for early steps on brownfields sites.

ii. Threats to Sensitive Populations: (1) *Health or Welfare of Sensitive Populations*: Our Reservation is home to a high proportion of low-income Native Americans. In the US, 1.7% of the population is Native American or Alaska Native (IA/AN). On the Reservation, 14.4% are Native American, and over 80% are Native American in our government center of Lapwai, Idaho, which has 25.9% poverty rate. Low income and higher poverty rates are partially due to large mill closures, and unfortunately, the percentage of native

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people living in poverty is increasing from stagnant wages and cost of living increases. 2010 US Census data shows throughout the Clearwater River corridor Target Area, children 18 years old and under average 75% of the population and seniors 65 and older average 20% of the population. Additionally, these two groups are considered Sensitive Populations to chemical exposure by the Centers for Disease Control and Prevention (CDC).

(2) *Greater Than Normal Incidence of Disease and Adverse Health Conditions*: Low-income native people on the Reservation have poor access to health care. They lack hospital services and have elevated death rates from multiple causes, including diabetes and cancer. 2010 Tribal Member Data from Nimiipuu Health Clinic shows 16.16% of Tribal members have diabetes and 10.96% have cancer. Compared to the U.S. rates of 8.3% for diabetes and 0.4% for cancer per 100,000 people >19 yrs old, as reported by the CDC. In 2006, the Nimiipuu Health Clinic in Lapwai was opened with a satellite office in Kamiah. Before these clinics opened, residents were 20 and 60 miles, respectively, from any medical care. Greater access to health care, through development of a new integrated government and social services center at the Fort Lapwai priority site, will improve our health outcomes.

Persons on the Reservation suffer from elevated mortality rates and other health challenges that have in some cases been linked to exposure to contaminants. Indian Health Service (IHS) data show that the mortality rate from cancer is higher among the native population than for the U.S. According to IHS data, native populations have the highest rate of asthma (both current and lifetime prevalence) of any race surveyed. These health problems may be associated with inhalation exposure to contaminants such as asbestos and volatile organic compounds on our brownfield sites. According to ATSDR, benzene (a petroleum constituent potentially present at the Husky Sports priority site) is a carcinogen. Asbestos and other respiratory hazard chemicals have been identified at Fort Lapwai and Blue North Mill. This grant will identify and develop a plan for cleanup of these compounds that pose significant respiratory hazards, cause cancer, or may affect groundwater.

(3) *Disproportionally Impacted Populations*: Dilapidation and blighted landscapes on the Reservation exacerbates mental health challenges for our low-income populations. We believe it leads to a sense of hopelessness and contributes to our higher suicide rate. According to *Trends in Indian Health* by the IHS, suicide for native youth (39.7 per 100,000), is the second leading cause of death, more than four times than the rate for all races. A query of EPA's EJSCREEN Environmental Justice (EJ) Indices for the Clearwater River corridor Target Area shows the Regional 95th Percentile of all EJ Indexes are above the US 95th Percentile. For example, NATA Air Toxics Cancer Risk Regional Percentile is 66 versus the US Percentile of 53, and Hazardous Waste Proximity Regional Percentile is 83 versus US Percentile of 70.

With assessment grant funds, we will work on large, blighted facilities in towns with the highest proportion of native residents. Starting in Lapwai with dilapidated lead- and asbestos-laden buildings in the center of the community, which is more than 80% Native American. If funded, we will devise plans for asbestos abatement and replacement of the water supply system, both key issues preventing largescale reuse of Fort Lapwai. At Blue North Mill, children from the community of Kamiah (16.3% Native American, 26.5% family poverty) are trespassing into formerly-industrial buildings that contain asbestos and lead-based paint. These kids are also potentially and unknowingly exposed to PCBs and other contaminants in the soil and air.

b. Community Engagement

i. Project Involvement and ii. Project Roles: Building on a 15-year history of Brownfields TRP work, we will involve the community partners listed in the table below. These partners range from non-profit economic development associations, to cities, public utilities, and private businesses.

Organization	Point of Contact	Role
Clearwater Economic Development Association (CEDA)	Christine Frei – Executive Director, cfrei@clearwater-eda.org, 208-746-0015 x 104	Identify and secure redevelopment financing.

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Nimiipuu Fund (Native Community Development Financial Institution [CDFI])	Jonelle Yearout – Executive Director, jonellew@nezperce.org, 208-621-3729	Provide business counseling for entities expanding on brownfields sites.
City of Kamiah	Betty Heater – Mayor, heaterb@cityofkamiah.org, 208-935-2672	Provide input regarding trails, infrastructure, and desired job growth at Blue North Mill.
Avista Energy	Ken Straw – Kamiah Service Director Ken.straw@avistacorp.com, 208-935-2201	Identify electrical connection requirements and costs for solar development at Blue North Mill.
SJX Jet Boats, Inc. (private boat manufacturer)	Steve Stajkowski – Owner, steve@sjxjetboats.com, 208-476-9900	Expand manufacturing to the Spalding Mill site.

As a sovereign American Indian Nation, we have many groups that routinely collaborate to provide input and assist with brownfields redevelopment. Our Brownfields TRP has obtained their input on brownfield issues. For example, acquiring and reclaiming land is the focus of the *Land Acquisition Committee*, which uses Tribal Enterprise income for land purchases following the *Land Acquisition Plan*. The Brownfields TRP Manager is routinely notified by GIS Analysts and land managers from Tribal Land Services when there is a concern for potential contaminants on strategic land purchases, which allows our brownfields program to follow-up.

We will coordinate brownfields efforts with Tribal Enterprises, which is directed by Kermit Mankiller, focusing assessment on priority sites that are the most likely to see redevelopment, such as proposed building materials testing at Husky Sports and at Blue North Mill. Tribal Enterprises involvement will be key to brownfields reuse planning for the TU-45 mill site, because they will build and control new operations. Additionally, we will coordinate with the *Facilities Planning Committee* established by NPTEC Resolution in 2019. Their mission focuses on road improvements Reservation-wide and the planning and redevelopment process specific to Fort Lapwai, however the decision framework is intended to be expanded and utilized for other properties as well. Finally, Tribal Enterprises has a track record of working collaboratively with Clearwater Economic Development Association (CEDA) to help finance new businesses. Reuse planning of five of our six our priority sites will align with CEDA's *2020–2025 North Central Idaho Comprehensive Economic Development Strategy*, with the goal of building resilient communities by fostering a collaborative framework to align public and private sector investments.

iii. Incorporating Community Input: Our community has the following advantages that help us obtain and respond to community input: 1) we have an accessible small population that lives primarily along one travel route (U.S. Highway 12 and the Clearwater River), 2) through our Brownfields TRP, we have relationships with the partner organizations listed above that interface with stakeholders across the Reservation, and 3) elected leadership (NPTEC) and for-profit leaders (Tribal Enterprises) are committed to brownfields redevelopment. Our techniques for obtaining input include presentations and surveys administered at Spring and Fall General Council Meetings with the tribal public, as-needed stakeholder meetings to review draft plans (SAPs, Cleanup Plans, and/or Reuse Plans), and publishing outreach materials through our Tribal Communications Program, quarterly. The Communications Program is responsible for the Nimiipuu Tribal Tribune monthly newspaper, and controlling content/quality of websites, official social media updates, large email announcements, and KIYE Radio broadcasts in Lapwai and Kamiah. The Water Resources Division maintains its own website with a Brownfields page and public record that is regularly updated by the TRP Manager. Public comments are considered by the TRP manager and incorporated into project workplans where appropriate.

In our small community, executives including Chairman Shannon Wheeler and Enterprises Director Kermit Mankiller are actively engaged in planning the cleanup and redevelopment of our priority sites, routinely interface with our Brownfields TRP Manager, John Loffredo, and are personally involved in

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monitoring the progress of environmental testing and planning, to ensure coordination with redevelopment timeframes.

3. **TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

a. Description of Tasks/Activities and Outputs: Tasks for the project are shown in the following paragraphs along with the schedule, lead entity, and outputs for each.

Task 1. Programmatic: The Nez Perce Tribe Brownfields Tribal Response Program Manager, John Loffredo, will be responsible for procuring a Qualified Environmental Professional (QEP) (within three months of award), preparing quarterly reports, updating ACRES, working closely with EPA to monitor and facilitate progress toward Work Plan goals, and attending one national brownfields conference. *Anticipated Schedule:* October 2021 – September 2024. *Task Lead:* Grantee. *Outputs:* 1 QEP contract; 12 quarterly ACRES updates; 1 national conference.

Task 2. Outreach: The QEP, with input and review from the Tribe, will be responsible for preparing educational fact sheets, holding meetings with site-specific redevelopment stakeholders (NPTEC, city governments, private and non-profit partners); maintaining the brownfield program website (<http://nptwaterresources.org/brownfields-tribal-response-program/>); and preparing presentations to Tribal Council on the status of the program and priority sites. *Anticipated Schedule:* October 2021 – September 2024. We will give one formal presentation to NPTEC per year in 2022-2024, hold stakeholder meetings prior to initial work on each priority site (3 per year for 2022 and 2023), and produce fact sheets after the completion of the first deliverable on each priority site. *Task Lead:* Grantee. *Outputs:* 6 fact sheets; 6 stakeholder meetings; 3 presentations to Tribal Council.

Task 3. Site Assessment: Assessments will start within four months of Work Plan approval and will be completed at least two months prior to grant expiration. The QEP will update the Tribe's EPA-approved Quality Assurance Project Plan (QAPP). The QEP will help the Tribe with site eligibility forms. Three of our priority sites (Blue North Mill, Fort Lapwai, and TU-45) have already been deemed brownfields-eligible and have initial phases of work complete. Assessment activities are listed below by priority site, with Phase I or II needed for the base-tier sites, and supplemental Phase II (soil and groundwater) needed at Blue North Mill. In addition to the priority sites, we expect to conduct 3 additional Phase I assessments and 1 Phase II assessment for building materials at a blighted property.

Each Phase II assessment will have a Sampling & Analysis Plan (SAP) with Health & Safety Plan (HASP), fieldwork/laboratory analysis, then a Report of Findings. *Anticipated Schedule:* March 2022 – June 2024 (Phase I on Howell priority site in first year, 1 additional Phase I per year for three years; Phase IIs on Priority Sites [Husky Sports, Howell Site, Spalding Mill, and Blue North Mill] in first two years, 1 additional Phase II in final year). *Task Lead:* QEP. *Outputs:* 1 updated QAPP, 4 AAI Phase I assessments; 5 Sampling and Analysis Plans; 5 Phase II assessments (one for building materials only), 5 Phase II Reports of Findings.

Priority Site	EPA-funded Assessment	Cleanup/Reuse Planning
Husky Sports (in Orofino)	Building materials testing, subsurface soil sampling near fueling system	Cleanup Plan (asbestos abatement and soil excavation)
Howell Site (Kamiah)	Phase I ESA, incl. surveying of property boundaries, surface soil sampling	N/A (after debris/vehicles removal, property will be reused as wildlife habitat)
Spalding Mill (Spalding)	Surface soil sampling at residence near eastern site entrance, boreholes in fill material on western end	Soil Cleanup Plan
Blue North Mill (Kamiah)	Supplemental Phase II (soil and groundwater, see summary in Section 3b)	Bid Specifications for building materials abatement, Site Reuse Plan
Fort Lapwai (Lapwai)	N/A (previously assessed through Targeted Brownfields Assessments (TBA) program)	Bid Specifications for building materials abatement, Preliminary Engineering Report (PER) for water system replacement

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TU-45 (Orofino)	N/A (previously assessed through TBA program and 5 years of TRP investigations)	Updated Reuse Plan
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Task 4. Cleanup/Reuse Planning: The QEP will produce 2 Bid Specifications for building materials abatement (Blue North Mill and Fort Lapwai), 2 Cleanup Plans (Husky Sports and Spalding Mill), Reuse Plans for 2 sites (Blue North Mill and TU-45), and will produce a water system PER (Fort Lapwai). *Anticipated Schedule:* March 2022 – June 2024 (Bid Specifications in 2022, water system PER in 2022, Cleanup Plans in 2024). *Task Lead:* QEP. *Outputs:* 2 Bid Specifications, 2 Cleanup Plans with Analysis of Brownfields Cleanup Alternatives (ABCA), 2 Site Reuse Plans, 1 water system PER. Tribal Enterprise staff will not charge the EPA assessment grant for salary dollars, rather contributing resources from Tribal funds generated by Enterprise-managed businesses when engaged with TRP Manager in cleanup/reuse planning activities throughout the 3-year period of performance. SRBA funds (up to \$1 million) will be leveraged to conduct reuse planning for habitat restoration of riparian areas adjacent to the Clearwater River and its tributaries at the Priority Sites listed above.

b. Cost Estimates:

A grant budget table and narrative detail including unit rates are as follows:

PROJECT BUDGET					
Budget Categories	Project Tasks				
	Task 1: Programmatic	Task 2: Outreach	Task 3: Site Assessment	Task 4: Cleanup/Reuse Planning	Total
Personnel	\$2,500	\$2,600	\$0	\$0	\$5,100
Fringe Benefits ¹	\$521	\$542	\$0	\$0	\$1,063
Travel ²	\$3,500	\$0	\$0	\$0	\$3,500
(No Equipment or Supplies)					
Contractual	\$0	\$8,322	\$215,800	\$63,500	\$287,622
Indirect (28.1% of Non-Contractual)	\$1,832	\$883	\$0	\$0	\$2,715
TOTAL	\$8,353	\$12,347	\$215,800	\$63,500	\$300,000

¹Overall fringe rate is 20.8%. ²Travel funds are for the national brownfields conference.

Descriptions are provided below of how cost estimates were developed for each task, including discussion of Contractual costs and the Tribe's costs (Personnel, Fringe, Travel, and Indirect).

Task 1. Programmatic (\$8,353 total, 2.8%): NPT Personnel costs are \$23.84/hour for 136.1 hours = \$3,245, Fringe is 20.8% of personnel costs = \$676, Travel is \$2,600 for one person to attend one national conference.

Task 2. Outreach (\$12,347 total, 4.1%): Personnel costs are \$23.84/hour for 109.1 hours = \$2,600, Fringe is 20.8% of personnel costs = \$542; Contractual costs are \$642 each for site-specific fact sheets on each of our 6 priority sites (\$3,245), \$745 each for stakeholder meetings on each of our 6 priority sites (\$4,470), and 3 annual presentations to NPTEC at \$850 each including preparation time (\$2,550 total).

Task 3. Site Assessment (\$215,800 total, 71.9%): Husky Sports Phase I and extensive surveying of property boundaries (highway right-of-way, tribal trust property, leased property) for \$5,500, 3 additional Phase s for \$3,500 each (\$10,500 total).

Phase II costs include one large soil and groundwater assessment at Blue North Mill, which would cost \$8,500 for background research and SAP, \$54,000 for fieldwork, and \$8,800 for data analysis and reporting. Itemized fieldwork estimate developed in October 2020 by a contractor to our 128(a) program includes 15 surface soil samples in the Log Yard and former footprint of the Boiler Ash Stockpile (\$9,280); 16 boreholes at two conductivity anomalies (likely buried waste), the Transformer Storage Building, AST containment area, and drainage system for the former Wash Rack (\$19,251); 5 groundwater screening

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wells including 2 near the sewage lagoon, 2 near the former Wash Rack, and 1 near the Transformer Storage Building; and slug testing of 2 wells to develop a dilution factor for use in creating site-specific cleanup levels (\$24,469).

Three other Phase II assessments on priority sites (Husky Sports, Howell Site, and Spalding Mill) at an average of \$32,167 each, and one additional Phase II for building materials for \$29,500. These Phase IIs each include SAP and report. Husky Sports, which needs both building materials and subsurface testing, is expected to cost more than average; and the Howell Site would cost less than average, with only surface soil sampling expected. Programmatic QAPP will also be updated for \$2,500.

Task 4. Cleanup/Reuse Planning (\$63,500 total, 21.2%): Two bid specifications for large-scale building materials abatement (Blue North Mill, Fort Lapwai) for average of \$8,000 each, two Cleanup Plans (Husky Sports, Spalding Mill) at average of \$5,250 each, two Reuse Plans (Blue North Mill, TU-45) at average of \$12,500 each including stakeholder input and conceptual renderings, and one water system PER (Fort Lapwai) for \$12,000.

c. Measuring Environmental Results: Using experience gained as spearheading the Brownfields TRP, John Loffredo will track outputs, assemble data on accomplishments, and evaluate progress toward completing Work Plan commitments. He will coordinate with the EPA Project Officer to develop a work plan for the tasks listed above. During the project, he will update ACRES quarterly, post site summaries to the Brownfields TRP website, and will discuss mid-project status with EPA in a call at least once every two months (more often as-needed based on the number of simultaneous tasks).

Outputs to be tracked include 1 QEP contract, 12 acres updates, 1 national conference attendance, 1 site-specific fact sheet and 1 stakeholder meeting for each of the 6 priority sites, 3 annual presentations to NPTEC, 1 QAPP, 4 Phase Is, 5 Phase IIs (including large Blue North Mill assessment), 2 bid specifications, 2 cleanup plans, 2 reuse plans, and 1 water system PER.

Mr. Loffredo will assemble data on Results and Outcomes through internal coordination with the Tribe's government, including quarterly requests to the multi-department *Facilities Planning Committee* for totals of acres redeveloped, dollar value and square footage of new construction, and construction jobs created. Should the Committee have delays in response, Mr. Loffredo will increase the urgency of his request by leveraging his relationship with the government's Executive Director and NPTEC's Tribal Chairman, both of whom meet regularly at our priority brownfields sites.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. **Organizational Structure:** The grant will be managed by the Brownfields TRP. The TRP is within the Water Resources Division (WRD) of the Natural Resources Department, which is overseen by the Executive Director of tribal government. The TRP has been conducting brownfields assessments, tracking, and reporting progress for 15 years, and will be primarily responsible for fulfillment of grant requirements. The Water Resources Division Director (Ken Clark) will facilitate contract approvals, perform routine audits of grant performance, and will advise regarding information transfer between the Finance Department and Brownfields TRP. The Executive Director will coordinate between *Facilities Planning Committee*, managers of tribal redevelopment resources (Enterprises income, SRBA funding), and the Brownfields TRP so that the TRP is alerted to required timeframes for due diligence and cleanup planning, and so that redevelopment resources are mustered in rapid sequence after brownfields assessment grant work.

ii. **Description of Key Staff:** *John Loffredo, Brownfields TRP Coordinator and Project Manager:* As TRP Coordinator, John's responsibilities include identifying brownfield sites, conducting site assessments, coordinating remediation, and conducting public outreach. Before joining the Tribe in 2019, John obtained his Master of Science degree in Natural Resource Sciences from Washington State University in 2018. He also holds B.S. and B.A. degrees in Natural Resource Management and Biology from Green Mountain College. John has experience managing projects through multiple previous

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positions for Idaho Fish & Game, Prince William Sound Aquaculture Corporation, US Forest Service, US Fish and Wildlife, and the US Geological Survey. *Ken Clark, Water Resources Division Director:* Ken is responsible for overseeing and providing management for all programs within the Division. Before becoming Director, Ken worked as the Water Quality Program Coordinator for the Water Resources Division, overseeing the Surface Water Quality Program, the Nonpoint Source (NPS) Management Program, and the Wetlands Program. Employed by the Tribe since 2010, Ken has a Master's degree in Natural Resources and Environmental Science from the University of Idaho with an emphasis in Water Resources Management. He also received his B.S. from the University of Idaho in Environmental Science. *Jessie Leighton, Executive Director for the Nez Perce Tribe:* Mr. Leighton oversees the 12 departments of the Nez Perce Tribe's government, including Natural Resources, which contains the Water Resources Division. He has an Architecture degree from the University of Idaho and an MBA from Gonzaga University. As an enrolled member of the Nez Perce Tribe originally from Lapwai, Mr. Leighton is personally invested in seeing the Assessment grant succeed. The bulk of his career has been in consulting and architecture projects with Tribes throughout the American West. In June 2020, he was appointed largely because of his expertise relevant to pending urban design and redevelopment efforts for the Fort Lapwai complex.

iii. Acquiring Additional Resources: Procurement will follow the Nez Perce Tribe *Finance Manual*, which specifies the following minimum competitive procurement procedures based on dollar value: (a) up to \$5,000 use professional judgement, (b) \$5,001 to \$50,000 bids required from multiple firms, and (c) greater than \$50,000 must have a publicly-advertised procurement process with formal bid opening. Any deviation from this tiered process must have initial approval from the Department Director and concurrence by NPTEC after subcommittee review. For this grant, the Tribe plans to collaborate with EPA to produce a publicly-advertised request for QEP proposals, and engage the Water Resources Division Director, Brownfields TRP Manager, and Executive Director of the tribal government in providing recommendations to NPTEC for contract approval. Specialty expertise will be subcontracted by the QEP as needed.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant:

(1) *Accomplishments:* The Nez Perce Tribe Water Resources Division has received funding through CERCLA 128(a) Tribal Response Program for 15 years and is currently working under FY20 cooperative agreement RP-96046313 and FY19 RP-96046312 extension. FY19 surplus funds attributable to multiple TRP staff retirement and departures. To date, an inventory of 31 Brownfield properties and 209 Sites of Concern within the Reservation boundaries have been identified by the TRP. The TRP received a Brownfield Assessment Grant RP-00J95701, a \$200,000 award for Tribal Unit 45 (ACRES ID 157983) ending September 30, 2017. Outputs included successful completion of Phase I ESA including the identification of seven recognized environmental conditions, EPA approvals of the Project Work Plan, and site-specific QAPP/SAP. The Phase II ESA included soil sampling, install and sampling of 16 groundwater monitoring wells, a geophysical investigation and removal of a UST. Institutional Controls at TU-45 were adopted by NPTEC in 2018. Successes are documented in ACRES for each property and applicable Cooperative Agreement.

(2) *Compliance with Grant Requirements:* The TRP has complied with the accepted work plans and terms of cooperative agreements of EPA TRP grants for 15 years. Over that time, TRP has expended > 90% of budgeted funding. In most cases, unspent funding was attributed to unforeseen delays such as flooding or prolonged snowpack that hampered site work. The TRP has demonstrated the ability to successfully manage federal or non-federal grants and the performance of all phases of work under each grant, including reporting under ACRES and timely submission of quarterly progress reports to EPA staff. Recently, the TRP successfully completed close-out reporting for FY16-18 RP-96046311 (\$536 unspent) and submitted a TRP Work Plan/Funding Request for FY2020 to the EPA Region 10 Project Officer.

Section III.B. Threshold Criteria Documentation

1. Applicant Eligibility

The Nez Perce Tribe is a federally recognized tribe eligible to apply for EPA Brownfields Assessment Grant funding.

2. Community Involvement

Through engagement of the local community and site-specific stakeholders, the Nez Perce Tribe proposes to move toward redevelopment on our priority sites; and to learn of additional sites for follow-up by our Tribal Response Program. As described in Sections 2.b (Community Engagement) and the Outreach task of Section 3 in the Narrative Proposal, the Tribe will engage the community, including economic development non-profits, local government, private businesses and utilities involved in redevelopment, neighbors, and environmental advocacy groups through the mechanisms listed below:

- Preparation and distribution (both email and printed) of educational fact sheets for each of our 6 priority sites;
- Stakeholder meetings involving landowners, investors, tribal departments, and the local neighbors, as applicable, for each of our 6 priority sites;
- Updates to our brownfield program website (<http://nptwaterresources.org/brownfields-tribal-response-program/>), announcements in the Nimiipuu Tribal Tribune newspaper, and posts to social media, after review for content and quality by Tribal Communications Program; and
- Annual presentations to the Tribal General Council, which is a voluntary meeting open to all tribal members.

3. Expenditure of Assessment Grant Funds

Not applicable. We do not have an EPA Brownfields Assessment Grant.



EPA - Region 10 Brownfields Site Eligibility Worksheet

(Updated: 12/5/17)

This worksheet is intended for EPA Region 10 Brownfields Cooperative Agreement Recipients (referred to as "grantee") as an aid for determining site eligibility. Brownfields funding can only be used on sites that meet the definition of a Brownfield. While this worksheet outlines many factors to be considered in determining eligibility, it does not capture all requirements. As an optional aid, grantee's may submit the completed form to their EPA Brownfields Project Officer. EPA will review the determination and may require additional information. You may contact your Project Officer if you have any questions.

Grantee name:

Nez Perce Tribe, Water Resource Division

Date submitted to EPA: 3/10/2020

Grant #:

RP-96046312-1

Date of proposed work: 06/01/2020

Grant type:

☐ Assessment ☐ Cleanup ☐ Revolving Loan Fund ☒ State & Tribal Response Program

Activity requested:

☐ Phase I ☒ Phase II ☐ ABCA ☒ Cleanup ☐ Other

Explain if other:

Known or Suspected Contaminant(s):

☒ Hazardous Substance(s) ☒ Petroleum ☐ Commingled

If the site has both hazardous substances and petroleum contamination that is commingled (i.e. not easily distinguishable), select the "commingled" box as well as the predominant contaminant. If the contamination is in distinguishable areas, then select both types of contamination.

Section A - Basic Site Information

Please attach a map of the site to assist with the determination.

A.1) Property Name:

Blue North Forest Products LLC (formerly Three Rivers) lumber mill site

A.2) Property Address:

283 Woodland Road

A.3) City:

Kamiah

State:

Idaho

Zip Code:

83536

A.4) Cross street (if applicable):

A.5) State Facility # (if applicable):

N/A

A.6) Tax Lot Number(s) and County:

1320000, Idaho County

A.7) Site Description (acreage, dimensions, GPS coordinates, etc):

Located within the Nez Perce Reservation, neighboring the City of Kamiah, Idaho; the property is 114 acres in size. The property is in the federally designated 100-year floodplain of the Clearwater River. Coordinates: N46.242852, W-116.033871. The site is within HUD-designated, Qualified Opportunity Zones (Census Tracts 16049940000 & 1606194001).

A.8) Who is the current property owner?

The Nez Perce Tribe

A.9) Describe your relationship with the owner and their role in the work to be performed:

I am the Tribe's Brownfields Tribal Response Program Coordinator within the Natural Resources Dept., Water Resources Division

A.10) Does the grantee have access to, or an access agreement for, this property?

☒ Yes ☐ No

☐ Copy of signed agreement attached

If no, explain how & when access will be acquired:

A.11 Explain why you want to assess/clean-up this property. What is the desired reuse? Is there a prospective purchaser interested in the property? Is the transaction time sensitive? Include any other details that you believe to be relevant.

The legacy contamination from lumber mill activities is not representative of the historic use of this large, south-facing bend in the Clearwater River. Potential environmental impacts include the site's contiguity to the Clearwater River and location within a federally designated floodplain. The site flooded in 1948 and 1964 when the river crested 3 ft above flood stage. Public health and welfare impacts may occur through exposure to hazardous materials leached into the soil and groundwater that is hydrologically connected to the Clearwater River. Potentially contaminated groundwater entering the Clearwater River is adjacent to intake pumps for the municipal drinking water source for the community of Kamiah. The National Ocean and Atmospheric Administration designates the Kamiah reach of the Clearwater River as Essential Fish Habitat. Leached contaminants entering the Clearwater River from Blue North Mill have the ability to harm subsistence fisheries. Tribal members depend on such as Endangered Species Act-listed Pacific salmon, steelhead trout, and Idaho State-listed endangered Pacific lamprey. Prior to the Treaty of 1855 signed between the Nez Perce and U.S. Government, the Blue North Mill site was a Nez Perce village. The Tribe purchased the property for Idaho Forest Products LLC in 2017. The Tribe's Brownfields Tribal Response Program, Nez Perce Tribal Executive Committee (NPTEC), and community action committees have prioritized Blue North Mill for assessment and cleanup because of 1) the potential impacts to public health, welfare, and the environment, and 2) the reuse needs of the community that include: flood mitigating green space and renewable energy development.

A.12) Describe the type of activities that have been conducted on the property and indicate generally when such activities took place. Identify when and how the site became/may have been contaminated; with what substance(s); the part(s) of the site that are contaminated; and, describe previous known uses. If the land has been vacant for many years or contamination is only suspected, explain why you think it needs assessment or cleanup:

Operations as a lumber mill and lumber storage facility at Blue North Mill spanned nearly eight decades, from the 1940s to 2016. The site has been vacant with no new sources of contamination since mill operations ceased in 2016. The site currently consists of eighteen buildings, nine of which are significantly damaged due to salvage operations by previous owners, vandalism, and a fire in January 2017. Due to decades of industrial logging operations, numerous contaminants may exist in the soil and groundwater throughout the entire 114-acre site including: asbestos, petroleum residue, arsenic, barium, cadmium, lead, mercury, volatile organic compounds, and polychlorinated biphenyls (PCBs). A Phase I Environmental Site Assessment (ESA) was completed in November 2017 by Alta Science & Engineering, Inc. (Alta) prior to the Tribe purchasing the site in December 2017. Subsequently, Alta performed a preliminary Phase II ESA in 2019. Past activities and sources of contamination include: petroleum storage and heavy equipment maintenance; lumber mill equipment with the potential to leak petroleum, building materials containing lead, ACM, and PCBs; kiln and boiler operations producing waste wood ash and boiler ash.

SECTION B - General Eligibility

Complete this section for each site regardless of contamination type.

B.1 - Sites Not Eligible for Funding by Statutes

a) Is the property listed on the National Priority List (NPL) or identified as part of a larger Superfund site under a different name?

☐ Yes ☒ No

b) Is this property located within the boundaries of Superfund site? *If yes, or unsure, check with your Project Officer to determine whether or not it is a contributor.*

☐ Yes ☒ No

c) Is the facility subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA?

☐ Yes ☒ No

d) Is the facility subject to the jurisdiction, custody, or control of the US Government? (Land held in trust by the US government for an Indian tribe *is* eligible)

☐ Yes ☒ No

e) Is any of the work being performed in order to comply with any federal environmental requirements?

☐ Yes ☒ No

B.2 - Sites Only Eligible for Funding with a Property Specific Determination by EPA

NOTE: The following special classes of properties require a "Property-Specific Determination" from EPA to be eligible. EPA's approval of a Property-Specific Determination will be based on whether or not awarding a grant will protect human health and the environment and either promote economic development or enable the property to be used for parks, greenways, and similar recreational or nonprofit purposes.

a) Is the site/facility subject to a planned or ongoing CERCLA removal action?

☐ Yes ☒ No ☐ Unsure

b) Has the site/facility been subject to an order or consent decree, or issued a permit by the U.S. or an authorized state under the Solid Waste Disposal Act (as amended by the Resource Conservation and Recovery Act (RCRA)), the Federal Water Pollution Control Act (FWPCA), the Toxic Substances Control Act (TSCA), or the Safe Drinking Water Act (SWDA)?

☐ Yes ☒ No ☐ Unsure

c) Is the site/facility subject to corrective action orders under RCRA (sections 3004(u) or 3008(h))?

☐ Yes ☒ No ☐ Unsure

d) Is the site/facility a land disposal unit that has submitted a RCRA closure notification under subtitle of RCRA and is subject to closure requirements specified in a closure plan or permit?

☐ Yes ☒ No ☐ Unsure

d) Has the site/facility had a release of polychlorinated biphenyls (PCBs) that is subject to remediation under TSCA?

☐ Yes ☒ No ☐ Unsure

e) Is the site currently receiving funding for remediation from the leaking Underground Storage Tank (LUST) Trust fund?

☐ Yes ☒ No ☐ Unsure

SECTION C - Hazardous Substance/Commingled Sites

Complete this section based on your response to "known or suspected contaminant" on page 1. Skip to Section D if the property is a petroleum site.

C.1 - Grantee

a) Does the grantee own the site?

☒ Yes ☐ No

NOTE: Grantees may assess (or cleanup if a 128(a) State Response Program) hazardous substance/commingled sites which they do not own where there is substantial public benefit or other compelling reason to use public funds for the assessment, even when the owner could be considered a potential responsible party. In such cases EPA recommends documenting the rationale for doing so.

b) Has the grantee ever leased, used, or accessed, or otherwise conducted or directed activities on the property?

☐ Yes ☒ No

i) Have any of these activities contributed to contamination?

☐ Yes ☒ No

c) Did the grantee generate or transport any waste brought to the site?

☐ Yes ☒ No

NOTE: Grantees cannot use EPA funds to conduct assessment or cleanup activities at sites where they operated, generated, or transported hazardous substances.

d) Is the grantee affiliated with the liable, or potentially liable party?

☐ Yes ☒ No

Explain if you answered "yes" to questions b-d:

C.2 - CERCLA Liability Defense

Complete this section only if the grantee owns the property. If the grantee does not own the property, skip to section "D" or "E" as appropriate.

NOTE: Because current owners of contaminated property are potentially liable under CERCLA, the grantee must demonstrate that they are not a liable party by establishing that they meet the requirements of one of the liability protections or defenses set forth in CERCLA. For more information on these liability protections, please refer to the Brownfields Law, the April 2009 Fact Sheet entitled: "EPA Brownfields Grants, CERCLA Liability and All Appropriate Inquiries," (<https://www.epa.gov/brownfields/brownfields-all-appropriate-inquiries>) and the March 6, 2003 EPA guidance entitled Interim Guidance Regarding Criteria Landowners Must Meet in Order to Qualify for Bona Fide Prospective Purchaser, Contiguous Property Owner, or Innocent Landowner Limitations on CERCLA ("Common Elements") (<http://www2.epa.gov/sites/production/files/documents/common-elem-guide.pdf>). Grantees may also call the Regional Brownfields Contact listed in Section VII with questions about eligibility.

a) If the grantee owns the property, indicate whether one of the following bases for determining that the grantee is not potentially liable as an owner under Section 107(a) of CERCLA applies.

☒ The grantee is a recognized tribal government entity and is not a "person" under the definition of CERCLA.

☐ The grantee acquired the property without knowledge of contamination (Innocent Landowner - CERCLA §101(35)(A)(i)).

☐ The grantee satisfies Bona Fide Prospective Purchaser (BFPP) protection (CERCLA §§101(40) and 107(r)).

☐ The grantee satisfies contiguous property owner protection for migrated contamination (CERCLA §107(q)).

☐ The grantee is a state or local government entity that acquired the property involuntarily through bankruptcy, tax delinquency, abandonment, or by exercising its power of eminent domain (Innocent Landowner - CERCLA §101(35)(A)(ii)).

Explain how the grantee qualifies for the defense selected above:

The grantee is a federally recognized tribal government entity.

All Appropriate Inquiry (AAI)

b) Has the owner conducted AAI?

☒ Yes ☐ No

c) When was the property acquired?

12/20/2017

d) What is the date of the Phase I report?

11/15/2017

Phase I "Shelf Life"

For properties acquired on 11/1/06 or later, one of the following must apply:

1) The Phase I was conducted within 180 days prior to property acquisition; OR

2) The Phase I was conducted within 1 year AND an updated report is dated within 180 days prior to acquisition.

e) Indicate which Phase I standard was used to conduct AAI?

- ☒ ASTM e1527-05 or ASTM e1527-13 (sites purchased after 12/31/13)
☐ ASTM E2247-08 (sites purchased on 3/23/09 or later & qualify as Forestland/Rural)
☐ ASTM e1527-05 (sites purchased between 11/1/06 and 12/31/13)
☐ ASTM e1527-00 or 1527-05 (sites purchased between 11/1/05 and 11/1/06)
☐ ASTM e1527-97 or 1527-00 (sites purchased between 5/31/97 and 11/1/05)
☐ Pre-5/31/97 purchaser standard as outlined in CERCLA§101(35)B)(iv)(I)

Reasonable Steps and Continuing Obligations

f) Has the owner taken reasonable steps with respect to hazardous substance releases?

☒ Yes ☐ No

Reasonable steps are actions taken to:

- ☒ Stop any continuing releases;
☒ prevent any threatened future release;
☒ prevent or limit exposure to any previously released hazardous substance

g) Has the owner complied with all land use restrictions and institutional controls since acquiring the property?

☒ Yes ☐ No ☐ Not applicable

h) Has the owner provided full cooperation, assistance, and access to persons that are authorized to conduct response actions?

☒ Yes ☐ No ☐ Not applicable

i) Has the owner complied with information requests and administrative subpoenas?

☐ Yes ☐ No ☒ Not applicable

j) Has the owner complied with providing legally required notices?

☐ Yes ☐ No ☒ Not applicable

Explain:

The owner has restricted access to the site with locked gates and installed security cameras that notify Tribal Police if any unauthorized access is detected and respond promptly. The current owner is not engaged in lumber mill activities, therefore preventing any threatened future release.

SECTION D - Petroleum Contamination Sites

Complete this section if you selected petroleum under "known or suspected contaminants" on page 1. Skip to Section E if your site is not a petroleum site.

Do you have a State determination letter attached?

☐ Yes ☒ No

NOTE: All petroleum sites need a written determination of eligibility by the State Environmental Agency or EPA based on the answers to Section D. Please answer these questions AND attach the State determination. The determination must address the petroleum eligibility criteria outline in the brownfields grant guidelines. States may apply their own laws and regulations to make the petroleum site determination; if they do so, please provide their determination and rationale.

D.1 - "Relatively Low Risk"

The State or EPA will have to determine that this site is of "Relatively Low Risk" compared to other petroleum-only sites in the State. Two key questions for this determination follow:

a) Have Leaking Underground Storage Tank funds been expended at this site?

☐ Yes ☒ No ☐ Unknown

b) Have Federal Oil Pollution Act response funds been expended at this site?

☐ Yes ☒ No ☐ Unknown

D.2 - "A Site for Which there is No Viable Responsible Party"

The State or EPA will have to determine that there is no viable responsible party using the following criteria.

a) Was the site last acquired through tax foreclosure, abandonment, or equivalent government proceedings?

☐ Yes ☒ No

b) Has a responsible party been identified through:

i) a judgment rendered in a court of law or an administrative order that would require any party to assess, investigate, or cleanup the site?

☐ Yes ☒ No

ii) a filed enforcement action brought by federal or state authorities that would require any party to assess, investigate, or cleanup the site?

☐ Yes ☒ No

iii) a citizen suit, contribution action or other 3rd party claim against the current or immediate past owner, that would, if successful, require that party to assess, investigate, or clean up the site?

☐ Yes ☒ No

Explain if you answered "yes" to any of the above:

c) Has the current owner done any of the following:

i) Dispensed or disposed of petroleum or petroleum product at the site?

☐ Yes ☒ No

ii) Owned the property during the dispensing or disposal of petroleum product at the site?

☐ Yes ☒ No

iii) Exacerbated the contamination at the site?

☐ Yes ☒ No

iv) Taken reasonable steps with regard to contamination at the site?

☒ Yes ☐ No

Explain if you answered "yes" to any of the above:

The owner has restricted access to the site with locked gates and installed security cameras that notify Tribal Police if any unauthorized access is detected and respond promptly. The current owner is not engaged in lumber mill activities, therefore preventing any threatened future release.

d) Who is the immediate past owner? Idaho Forest Group, LLC

e) Has the immediate past owner done any of the following?

i) Dispensed or disposed of petroleum or petroleum product at the site?

☐ Yes ☒ No

ii) Owned the property during the dispensing or disposal of petroleum product at the site?

☐ Yes ☒ No

iii) Exacerbated the contamination at the site?

☐ Yes ☒ No

iv) Taken reasonable steps with regard to contamination at the site?

☒ Yes ☐ No

Explain if you answered "yes" to any of the above:

The immediate previous owner restricted access to the site with locked gates and conducted a Phase I ESA to identify contaminants of potential concern as they were in the process of salvaging lumber mill equipment.

f) Based on the above, for purposes of brownfields funding, is there a responsible party?

☐ Yes ☒ No

Explain:

The current owner, nor the immediate previous owner contributed to or exacerbated contamination at the site. The immediate previous owner purchased the property from Blue North Forest Products, LLC in 2016. Lumber mill activities ceased at the site as Blue North Forest Products, LLC sold the property to Idaho Forest Products, LLC.

g) If answer to f) is yes, is that party viable (has adequate financial resources to pay for assessment of the site)?

☐ Yes ☐ No

Explain:

N/A

The petroleum site is ineligible if there is a viable responsible party. If there is no responsible party, or if there is a responsible party who is not viable, continue.

D.3 - "Cleaned Up By a Person Not Potentially Liable"

The State or EPA must also determine that the site will be cleanup up by a person not potentially liable. This applies to cases where the grantee is not the current owner.

a) Has the grantee ever:

i) Exacerbated the contamination at the site?

☐ Yes ☒ No

Explain:

The owner has restricted access to the site with locked gates and installed security cameras that notify Tribal Police if any unauthorized access is detected and respond promptly. The current owner is not engaged in lumber mill activities, therefore preventing any threatened future release.

ii) Dispensed or disposed of petroleum or petroleum product at the site?

☐ Yes ☒ No

Explain:

The current owner is not engaged in lumber mill activities, therefore preventing any threatened future release.

iii) Explain how the grantee/applicant took "reasonable steps" with respect to the contamination:

The owner has restricted access to the site with locked gates and installed security cameras that notify Tribal Police if any unauthorized access is detected and respond promptly. The current owner has performed a Phase I ESA, a preliminary Phase II ESA and is currently planning asbestos assessment/abatement, building demolition, targeted soil sampling and other Phase II-related assessment work on the site.

D.4 - Sites Not "Subject to a RCRA Corrective Action Order"

a) Is the site "subject to any order issued under Sec. 9003 (h) of the Solid Waste Disposal Act?"

☐ Yes ☒ No

Explain if "yes":

SECTION E - Site Eligibility Determination

Complete your eligibility determination based on the information you provided.

Grantee Determination

- ☐ The Site is eligible for EPA Brownfields Funds.
- ☐ The Site is not eligible for EPA Brownfields Funds.
- ☒ The Site is eligible for EPA Brownfields Funds but requires EPA Property-Specific Determination.

If requiring a property-specific determination, explain why Brownfields financial assistance is needed and how it will protect human health and the environment and either promote economic development or enable the creation of, preservation of, or addition to parks, greenways undeveloped property, other recreational property, or other property used for nonprofit purposes:

The Blue North Mill site occupies a large, south-facing bend of the Clearwater River, which served as a seasonal hunting and fishing village for the Nez Perce for thousands of years before displacement. As a federally recognized tribe, the Nez Perce Tribe is not potentially liable as an owner under Section 107(a) of CERCLA. An EPA Property-Specific Determination will allow the Tribe to identify quantities of contaminants at the site associated with lumber mill activities and lead to site cleanup. Environmental justice issues stemming from decades of mining and timber extraction, has left 1855 Treaty reserved lands, such as Blue North Mill, contaminated and a source of frustration and public health risk. Reuse as a 100-acre community green space would allow for wetlands and a large riparian buffer zone to be established along the north bank of the Clearwater River that would promote flood mitigation and foster natural recharge of groundwater that would benefit ecological connectivity between land and river. Reuse as green space would create opportunities for native vegetation to attract wildlife, prevent remnant contaminants from becoming airborne, and allow for the site to be cleansed naturally. Development of green space (pedestrian walkways, community gardens, recreational areas) and use of renewable energy systems are of the highest priorities for the Nez Perce, whose heritage and culture are based on a sense of place, connection to nature, and respect for the environment. Furthermore, Kamiah is a designated Opportunity Zone, (Census Tract 16049940000). Investment in the community's electrical grid would create short-term economic development to bring a 1-acre, 100-200 kW community solar array online, and will incentivize long-term economic development in the community by providing cheap, and reliable renewable energy to the city of Kamiah.

Name: John Loffredo

Organization: Nez Perce Tribe, Water Resource Division

Date: 3/10/2020

List any attachments that are being included to support your determination:

EPA Review Results

- ☒ EPA accepts the grantee's determination that the site is eligible for brownfields funds.
- ☐ EPA has determined that the site is not eligible for Brownfields funds.
- ☐ The site would be excluded from the definition of a Brownfields site in 101(39)(B) but EPA has determined the site is eligible for funding per 101(39)(C) based on the information provided by the requestor.
- ☐ EPA does not have sufficient or appropriate information to accept the grantee's determination.

Comments:

04.17.2020 - John Loffredo, NPT provided clarification to EPA by email on 04.17.20 - He confirmed that a Property Specific

Determination is not required and that under Section C.f.2. Reasonable Steps "we have taken reasonable steps to stop any continuing releases through two ESA's conducted in the last three years. A 2017 Phase I ESA and 2019 pre-Phase II ESA identified all recognized environmental concerns and assessed the threat of any continued release of petroleum and PCBs to soil and groundwater. " EPA PO checked off the first box ("Stop any continuing releases") under Reasonable Steps to reflect this statement. ~ Terri Griffith, EPAPO

EPA Project
Officer:

TERRI GRIFFITH

Digitally signed by TERRIGRIFFITH
Date: 2020.04.17 18:50:57 -07'00'

Date: 04.17.2020 - Terri Griffith, EPA PO

EPA Staff Enforcement Screen

☒ Confirmed non-contributor to a Superfund site

Date: 04.17.2020 - Terri Griffith, EPA PO

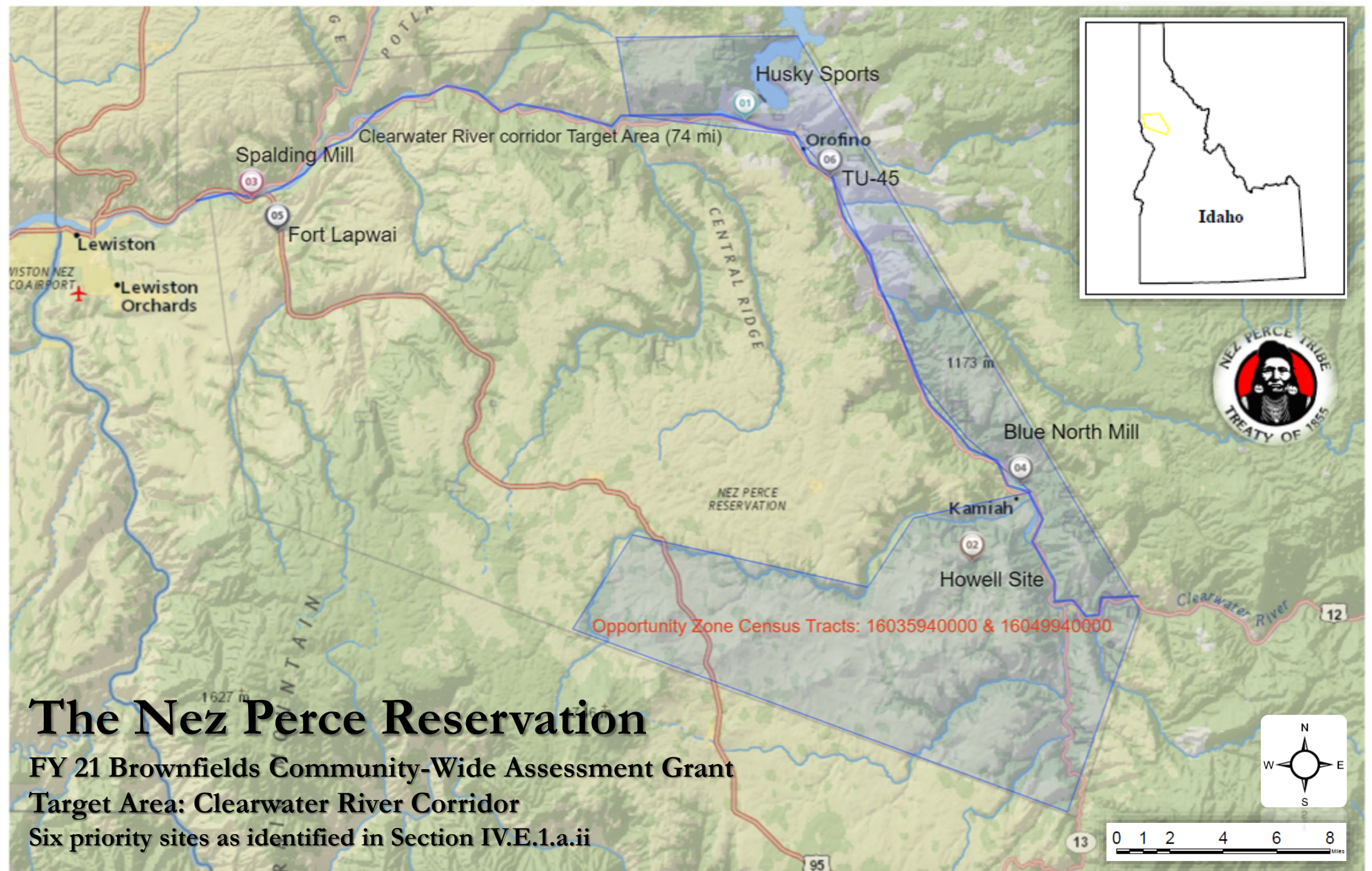


Figure 1. Target Area map – Clearwater River corridor Target Area for FY21 EPA Brownfields Community-Wide Assessment Grant proposal. Target Area extends from the eastern to the western boundary of the Nez Perce Reservation for 74 miles following the Clearwater River and U.S. Highway 12. The Target Area includes the cities of Kooskia, Kamiah, Orofino, and Lapwai, Idaho where we have identified six priority sites for assessment, cleanup, and timely redevelopment and/or other beneficial use.

Section IV.E. Attachments:

Key Staff Resumes

Water Resources Division, Director:

Ken P. Clark

650 N. Hayes St., Moscow, Idaho 83843|Mobile: (208) 596-2338|E-mail: kenpclark@hotmail.com

Summary

Experienced Division Director with over 16 years of professional experience working in government administration. Extensive experience with project development and coordination, with a demonstrated track record of successfully managing small to large projects from start to finish. Thorough understanding of government regulations and planning processes. An organized and effective leader, able to prioritize and delegate tasks effectively to ensure timely project completion within a team environment.

Professional Experience

**Director, Water Resources Division
Nez Perce Tribe Lapwai, ID**

October 2016 - Present

- Responsible for administration of delegated and associated activities under the Federal Clean Water Act (CWA), the Resource Conservation and Recovery Act (RCRA), and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).
- Oversees and administers: CWA §106 Water Quality Assessment and §319 Nonpoint Source Pollution Prevention Programs; Tribal Wetlands Program; Brownfields Tribal Response and Assessment Programs (CERCLA/RCRA); Tribal Leaking Underground Storage Tank Program; Tribal Climate Change Program; Tribal Solid Waste/Recycling Program; and Tribal Drinking Water and Wastewater Utilities Program.
- Oversees and administers an annual operating budget of approximately \$2,300,000.
- Works with senior-level staff and Tribal leadership to help determine policy direction.
- Researches, writes, and submits grant proposals to secure project funding.
- Supervises both professional and technician level staff, including training, assigning tasks, and evaluating work.
- Develops and manages contracts for stream and wetland restoration projects, Brownfield assessment projects, and utility infrastructure projects. Works directly with contractors or field staff to ensure projects are completed as specified.
- Assists in the development and implementation of best management practices (BMPs) for watershed restoration projects, including but not limited to: road improvements and obliteration, fencing, watering systems, revetments, and riparian plantings.

- Writes technical documents and articles, reviews documents related to area of responsibility, and provides technical comments.
- Maintains databases of completed and proposed watershed restoration projects and water quality monitoring data.
- Serves as Tribal representative on a number of regional and national boards, including: local Watershed Advisory Groups (WAGs), the Clearwater Basin Advisory Group (BAG), the Tribal Pesticide Program Council (TPPC), the Columbia River Basin Toxics Reduction Working Group, and the Columbia River Basin Restoration Clean Water Act 123 Working Group.
- Advises Tribal leadership on a variety of issues, regulations, policy and recommended priorities related to multiple programs within the Division.
- Provides environmental education and outreach to the community.

Supervisor: Aaron Miles

Phone: (208) 843-7368

**Water Quality Program Coordinator
Nez Perce Tribe Lapwai, ID**

March 2010 – October 2016

- Writes and submits grant proposals to secure project funding.
- Oversees and administers an annual operating budget of approximately \$700,000.
- Responsible for administration of delegated and associated activities under the Federal Clean Water Act, including permit review and annual water quality assessment reports.
- Coordinates and oversees current and future scope of water quality monitoring network, including the gathering, compilation, analysis, and reporting of environmental data and the operation and maintenance of monitoring equipment.
- Supervises both professional and technician level staff, including training, assigning tasks, and evaluating work.
- Develops and manages contracts for stream and wetland restoration projects, and works directly with contractors or field staff to ensure projects are completed as specified.
- Assists in the development and implementation of best management practices (BMPs) for watershed restoration projects, including but not limited to: road improvements and obliteration, fencing, watering systems, revetments, and riparian plantings.
- Writes technical documents and articles, reviews documents related to area of responsibility, and provides technical comments.
- Maintains databases of completed and proposed watershed restoration projects and water quality monitoring data.
- Serves as Tribal representative on regional Watershed Advisory Groups (WAGs) and the Clearwater Basin Advisory Group (BAG).
- Advises Tribal leadership on water quality issues, regulations, policy and recommended priorities
- Coordinates and oversees investigations of complaints, conducts inspections or field investigations, and evaluates permits and reports.

- Works with local landowners to implement best management practices and provides technical assistance to other state, Federal, and local agencies including but not limited to: Soil and Water Conservation Districts, the Natural Resource Conservation Service, and the Idaho Soil and Water Conservation Commission.
- Assists in Total Maximum Daily Load (TMDL) and Implementation Plan development.
- Provides environmental education and outreach to the community.

Supervisor: James Holt

Phone: (208) 843-7368

Water Quality Analyst **September 2002 – March 2010**
Idaho Association of Soil Conservation Districts (IASCD) Moscow, ID

- Collected a wide variety of stream data, including: dissolved oxygen, specific conductance, discharge, pH, nutrient levels, bacteria levels, and sediment levels.
- Used stream measurement devices, including: various flow meters, bridge boards, cranes, pH meters, dissolved oxygen meters, multi-parameter water quality sondes, water level loggers, water temperature loggers, turbidimeters, conductivity meters, and total dissolved solids meters.
- Created spreadsheets to store data, used statistical programs to analyze, plot, and interpret data.
- Worked with local Soil and Water Conservation Districts to develop unique monitoring plans for watersheds of interest, selected monitoring site locations, obtained landowner permission, and implemented water quality monitoring projects.
- Generated numerous reports and gave public presentations at conferences and to various interested governmental and citizen groups.
- Wrote grant proposals and secured funding from the Pacific Coastal Salmon Recovery Fund (PCSRF), EPA §319 Grant Project, and the Water Quality Program for Agriculture (WQPA), for water quality monitoring projects.
- Supervised field staff and volunteers in the collection of water quality data for four years.
- Developed and maintained operating budgets for individual projects.

Supervisor: Kent Foster

Phone: (208) 685-6981

Biological Technician **June 2001 – September**
2002 Idaho Department of Environmental Quality Lewiston, ID

- Implemented biological and habitat assessment surveys throughout north central Idaho.
- Collected macroinvertebrates, classified riparian vegetation, electro-shocked for fish, measured total stream discharges, classified stream substrate according to the Wolman Pebble Count methodology, used a densiometer to calculate canopy closure, determined longitudinal habitat distribution for a variety of streams as well as documenting and mapping these surveys for future reference.
- Created a GIS database of temperature probes located throughout the region.

- Analyzed temperature data to identify which streams were exceeding temperature criteria for bull trout habitat, so recommendations could be made to put those streams on the 303(d) list.
- Assisted in the development and editing of Total Maximum Daily Load (TMDL).

Supervisor: Daniel Stewart

Phone: (208) 983-0808

Education

**Professional Science Masters (PSM), Natural Resources and Environmental Science
University of Idaho, Moscow, ID** Graduation Date: December 2014

- Emphasis of study: Water Resources Management.

Bachelor of Science, Environmental Science University of Idaho, Moscow, ID
Graduation Date: May 2001

- College of Letters and Science Academic Dean's List.

Associate of Science

Vermilion Community College, Ely, MN Associate in Science Degree: 1997

- Emphasis of Study: Wilderness Management.
- Vermilion Community College's Academic High Honors List.

Additional Skills

- Proficient in: Power Point, MS Excel, MS Word, MS Project, Sigma Plot, ArcInfo, Garmin Pathfinder, Onset temperature software, Internet Research, and E-mail.
- Extensive knowledge of environmental laws, rules, and regulations, including: the Clean Water Act, the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), the Resource Conservation and Recovery Act (RCRA).
- Significant experience developing grant proposals.
- Exceptional verbal and written communication skills.
- Ability to work well with others and contribute positively as part of a team.
- Hardworking and very dependable.
- Ability to work independently with minimal supervision.

Project Manager/ Nez Perce TRP Coordinator:

John Loffredo

109 N Lilly Street, Moscow, ID • Loffredo.j88@gmail.com • 860.214.8054

EDUCATION

Washington State University · Pullman, WA
M.S. Natural Resource Sciences

December 2018

Green Mountain College · Poultney, VT
B.S. Natural Resource Management and B.A. Biology

May 2012

PROFESSIONAL EXPERIENCE

Brownfields Tribal Response/LUST Assessment & Prevention Program Coordinator – Nez Perce Tribe · Lapwai, ID October 2019–Present

Manager for Brownfields Tribal Response, LUST Assessment & Cleanup, and Rapid Environmental Response programs on the Nez Perce Reservation.

- Managed five, Environmental Protection Agency (EPA) grants to support programmatic capability for Underground Storage Tank (UST) compliance, Leaking Underground Storage Tank (LUST) closure, Phase I environmental due diligence, Resource Conservation and Recovery Act (RCRA) enforcement, and brownfields redevelopment with the Water Resources Division's Groundwater Program.
- Submitted timely annual work plans and quarterly budget reports to fulfill EPA and Tribal funding agreements per Comprehensive Environmental Resource Conservation and Liability Act (CERCLA)§128(a) and 40 CFR Part 280 & 281. Submitted grant applications for CERCLA§ 104(k) funding opportunities to facilitate brownfield environmental assessments.
- Participated in government-to-government consultations between the Tribe and Army Corps of Engineers during dredge fill discharge permitting per Clean Water Act§404(b) for the Midas Stibnite Gold Project within the 1855 ceded territory.
- Participated in Negotiated Rulemaking meetings for Idaho State rules and fees on water quality standards and hard rock mining best management practices administered by the Department of Environmental Quality and Department of Lands.
- Audited internal policies and procedures regarding environmental site assessment quality control/quality assurance. Reviewed and streamlined hazmat spill operations through capital investment in programmatic equipment.
- Negotiated contracts with environmental engineers to conduct environmental site assessments, long-term groundwater monitoring, asbestos abatement, timber reclamation, and hazardous waste removal.
- Advised Tribal Enterprises on legal due diligence pertinent to legacy contamination and landowner liability prior to land acquisitions.

Research Scientist – Dr. Daniel Strawn, Environmental Soil Chemistry Lab, University of Idaho · Moscow, ID February 2019–May 2019

Full-time research scientist working to develop and implement Biochar filtration systems to remove phosphorous from wastewater and recover phosphorous for use as slow-release fertilizer in agriculture settings.

- Conducted bench column and isotherm experiments to determine phosphorus adsorption and desorption rates on sand, biochar, and iron substrates.
- Developed protocols for extracting phosphorous from biochar fertilizers to determine phosphorous availability rates for plants.
- Analyze and summarize experimental data for dissemination to research group collaborators.

Research Assistant – Dr. Barry Moore, Water Quality Lab, Washington State University · Pullman, WA June 2016–May 2019

Collaborated with fellow graduate RA's to conduct graduate thesis research in fisheries and freshwater ecology. Performed routine water quality monitoring and produce annual reports for local municipalities and tribal entities to fund our research assistantships.

- Organized and maintained water quality field sampling gear and sampling field schedule.
- Collected water, invertebrates, phytoplankton, and zooplankton samples using standard protocols
- Conducted analytical water chemistry for the quantitative determination of total nitrogen, total phosphorous, alkalinity, NOx, and ammonia using Seal Analytical AA3 chemistry analyzers.
- Identified and enumerated benthic and littoral macroinvertebrates to quantify monthly relative abundance and biomass estimates.
- Designed standard protocols for the Confederated Colville Tribes fisheries department for quantifying annual periphyton biomass, quantifying niche-littoral habitats, and monitoring crayfish abundance.
- Conducted quarterly fish sampling via boat electrofishing and gill netting for diet, aging and SIA analysis.
- Produced annual reports for funding agencies on water quality parameters and deliverables related to graduate thesis research projects.

Hydrologic Surveyor – United States Geological Survey · Augusta, ME Nov 2015–May 2016

Led land surveying crews to collect geospatial information on bridges, structures, and geographic features on rivers in the Greater Boston area to inform FEMA flood risk maps.

- As lead surveyor, organized and led multi-day survey efforts with minimal supervision.
- Kept organized and detailed notes in accordance with FEMA flood risk mapping protocol. Collaborated with hydrologic modelers to sync survey data and relevant notes into HEC-RAS.
- Operated and maintained Trimble S6 total station and R8 GPS rovers.

Fisheries Technician – Mountain Lakes, Idaho Fish & Game · Salmon, ID Mar 2015–Oct 2015

Worked as a fisheries technician on the Salmon River, its tributaries, and on the alpine lakes in IDFG's Region 7.

- Organized and led backpacking trips in the alpine to gillnet mountain lakes to assess and inform stocking regimes.

- Conducted zooplankton quality indices on subalpine and alpine lakes.
- Routinely collected otoliths and prepared samples for cross-sectioning and digitizing.
- Operated adult steelhead weirs and anadromous rotary screw traps.
- PIT tagged juvenile steelhead and Chinook salmon. Utilized PTAGIS and departmental database to manage data.
- Conducted redd and carcass surveys for resident rainbow trout, steelhead, and Chinook salmon.
- Deployed spaghetti and floy tags in hatchery fish for depletion estimates of stocked water bodies.
- Retrieved coded wire tags in migrant steelhead to observe straying of various hatchery stock.

**Biological Science Technician – Sea Lamprey Control, U.S. Fish & Wildlife · Marquette, MI
Apr 2014–Oct 2014**

Conducted surveys with backpack electrofishers and granular lampricides to assess presence, abundance, and distribution of larval sea lampreys and in Great Lakes tributaries as part of a binational invasive species control effort.

- Anaesthetized larvae with MS-222 and conducted identification to species of native and invasive lamprey.
- Independently constructed, monitored and removed lampricide feeder stations and applied lampricides to remove sea lamprey larvae from streams and lentic areas.
- Assessed water chemistry, stream discharge, and lampricide application rates using an ISCO automatic water sampler, laboratory pH meter, alkalinity titration, and spectrophotometer.
- Conducted stream substrate inventories using standard protocols to identify lamprey habitat. • Traveled by foot, kayak, ATVs, and motor boats <20' for access to survey and lampricide sites
- Navigated to remote field sites and collected site location data using handheld GPS; managed geospatial data in Garmin's BaseCamp.

**Fish Culturist, Prince William Sound Aquaculture Corporation · Cordova, AK
Aug 2013–Mar 2014**

Lived and worked as a permanent staff member at the remote Wally Noerenburg Hatchery located on Esther Island in Prince William Sound. Over 200 million pink, chum, coho and Chinook salmon are reared and released annually from WNH in an intensive aquaculture setting.

- Led crews of two to ten seasonal fisheries technicians in the completion of fish culture projects.
- Developed leadership skills including: multi-tasking, teaching and delegating, leading by example, self-reliance, proficient problem solving, and adaptability.
- Conducted data collection and interpretation with Excel and HOBOWare temperature logs. Manipulated salmon fry growth patterns using Excel generated projections coupled with wet weight sampling.
- Interpreted salmon scales with a Micro-phish to determine age class distribution of brood stock.
- Monitored dissolved oxygen, temperature, pH and alkalinity using an YSI meter.
- Collected fish using dip nets, seines, and hand-drawn trawl nets; anaesthetized fish with MS-222.
- Collected egg size and quality control samples prior to hatch.

- Maintained and repaired free-floating net pens along with NOPAD and KATOI incubators. • Suggested improvements to the hatchery operating and sampling procedures to increase scientific integrity and overall hatchery efficiency.
- Promoted a culture of safety in and out of the work place with a mind to minimize hazards in the inherently hazardous environment of a remote Alaskan island.

**Fisheries Technician, Prince William Sound Aquaculture Corporation · Cordova, AK
Feb 2013–Aug 2013**

- Salmonid fish culture projects participated in: Chum & pink salmon egg-take, incubation, and outmigration. Coho & Chinook start up and raceway rearing.
- Worked independently and as a team to accomplish assigned tasks that assisted with the timely and proficient completion of fish culture projects in an industrial aquaculture setting.

**Forestry Technician, South Dakota Association of Conservation Districts · Custer, SD
Oct 2012–Jan 2013**

Identified and marked trees colonized by mountain pine beetle for culling in Custer State Park located in South Dakota's southern black hills.

- Distinguished mountain pine beetle pitchouts from turpentine and other wood boring insect pitchouts.
- Led crews ranging from four to eight on transects via GPS, topographic maps, and compass bearings. Recorded survey data that informed the management of affected stands using GPS.

**Fisheries Management Intern, US Forest Service/SCA · Stanley, ID
June 2012–Sep 2012**

Conducted backpack electrofishing depletion surveys to estimate fish populations in sub-alpine streams throughout the Sawtooth National Recreation Area.

- Identified and measured fish and collected DNA samples for threatened and endangered cutthroat and bull trout species.
- Hiked 8-14 miles daily in backcountry settings.
- Other duties include: stream and riparian habitat surveys, deployment/collection of seasonal and annual in-stream thermographs, assisted with culvert removal and riparian restoration, and conducted unauthorized road/dispersed campsite surveys using a Trimble.

Assistant Systems Engineer, Aetna · Hartford, CT June 2007–Jan 2010

Held a position as an intern and later a full time staff member on Aetna's Software Portfolio Management team.

- Worked intimately with service contract negotiators to manage Aetna's software service contracts.
- Interpreted complex user agreements to compile usage rights and allocating usage across multiple internal departments.
- Managed datasets in MS excel, access and a third-party database.
- Critiqued protocols and database functionality in a QC/QA capacity.

**Independent Study, Effect of Beech Bark Disease on Wildlife, Green Mountain College
Nov 2012–May 2012**

Designed and carried out a research project investigating the effect of Beech Bark Disease (BBD) on the presence of granivorous small mammals and browse severity of white-tailed deer.

- Identified and ranked beech trees infected with BBD and illustrated with ArcGIS based maps.
- Cored beech trees for aging purposes, performed deer browse transects, and conducted a capture and release trapping scheme for small mammals.
- Executed basic statistical analyses using Excel and presented study results at the spring 2012 Lake Champlain Research Consortium held at Johnson State College.

**Field Technician, Wildlife Corridor Carnivore Research Project, Green Mountain College
Fall 2011**

- Assisted in post-doctoral study that investigated the movement of fishers (*Martes pennanti*) between the Green Mountain and Adirondack mountain ranges in an effort to identify potential wildlife corridors.
- Identified and recorded trap locations with GPS, maintained and set non-invasive traps, and recorded field data.

**Summer Research Intern, Vermont Institute of Natural Science · Quechee, VT
Summer 2011**

*Designed a research proposal to study the link between past land use and current forest cover type on the invasiveness of Japanese barberry (*Berberis thunbergii*) on VINS' 47 acre property.*

- Created a native and invasive plant database for VINS using Excel.
- Led and supervised small groups of volunteers on field work days to remove invasive species on VINS property.

PEER REVIEWED PUBLICATIONS

Loffredo JL., Moore BC., Lee RW., Katz SL., Cross BK. 2018. Trophic status of a non-native crayfish in an oligotrophic lake: bottom-up view of a mixed warm-coldwater sport fishery food web. Lakes and Reservoir Management. DOI:10.1080/10402381.2019.1613460.

NON-PEER REVIEWED PUBLICATIONS

Messner, J., G. Schoby, **J. Loffredo**, and M. Belnap. In press. Salmon Region Fisheries Management Annual Report, 2015. Idaho Department of Fish and Game, Boise.

Lanouette, B., Moore, B., **Loffredo, J.**, Taylor, T., and Child, A. In press. Confederated Colville Tribes Department of Fish & Wildlife. Buffalo Lake Water Quality and Fishery Assessment Summary. 2016. Washington State University, Pullman.

Lanouette, B. Moore, B., **Loffredo, J.**, Taylor, T. In press. Confederated Colville Tribes Department of Fish & Wildlife. Buffalo Lake Water Quality and Fishery Assessment Summary, 2017. Washington State University, Pullman.

Lanouette, B. Moore, B., **Loffredo, J.**, Taylor, T. In press. Confederated Colville Tribes Department of Fish & Wildlife. Buffalo Lake Water Quality and Fishery Assessment Summary, 2018. Washington State University, Pullman.

PRESENTATIONS

Poster:

- John Loffredo, Barry Moore, Benjamin Cross. “Using stable isotopes to investigate the feeding ecology of an invasive crayfish.” Washington State Lakes Protection Association 2017 annual meeting. October 16, 2017 Spokane, WA.
- John Loffredo, Barry Moore, Benjamin Cross. “A stable isotope investigation of the trophic status of an invasive crayfish in an oligotrophic lake.” Idaho Chapter of American Fisheries Society 2018 annual meeting. February 29, 2018. Idaho Falls, ID
- John Loffredo, Barry Moore, Benjamin Cross. “A stable isotope investigation of the trophic status of an invasive crayfish in an oligotrophic lake.” WA-BC Chapter of American Fisheries Society 2018 annual meeting. March 15, 2018. Kelowna, BC

Oral:

- John Loffredo, Barry Moore, Benjamin Cross. “Using stable isotopes to investigate the feeding ecology of an invasive crayfish.” 2017 Western Division American Fisheries Society Student Colloquium. November 16, 2017 McCall, ID.
- John Loffredo, Barry Moore, Benjamin Cross. “Investigating the trophic status of a non-native crayfish in an oligotrophic lake: bottom-up view of a warm and cold-water sport fishery food web.” 2017 Western Division American Fisheries Society annual meeting. May 15, 2018. Anchorage, AK.

PROFESSIONAL SERVICE

American Fisheries Society, Idaho Chapter, Palouse sub-unit

May 2016 – December 2018

- Member of the executive committee for Palouse sub-unit of the Idaho Chapter for AFS in 2017 as Washington State University Student Representative, and in 2018 as sub-unit Vice President.
- Participated in monthly meetings to organize community outreach, undergraduate professional development functions, and professional society annual conferences.

AWARDS

Washington State University, School of the Environment

2017 Robert Lane Fellowship recipient

Green Mountain College

2010 Environmental Advancement Scholarship recipient

2010 Transfer Academic Merit Scholarship recipient

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

10/28/2020

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

BG-97065606

State Use Only:

6. Date Received by State:

7. State Application Identifier:

Idaho

8. APPLICANT INFORMATION:

* a. Legal Name:

Nez Perce Tribe

* b. Employer/Taxpayer Identification Number (EIN/TIN):

* c. Organizational DUNS:

0782083030000

d. Address:

* Street1:

120 Beaver Grade

Street2:

PO Box 365

* City:

Lapwai

County/Parish:

* State:

ID: Idaho

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

83540-0365

e. Organizational Unit:

Department Name:

Natural Resources

Division Name:

Water Resources

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

* First Name:

John

Middle Name:

R.

* Last Name:

Loffredo

Suffix:

Title:

Brownfields TRP Coordinator

Organizational Affiliation:

Nez Perce Tribe, Water Resources Division

* Telephone Number:

208-843-7368

Fax Number:

* Email:

johnl@nezperce.org

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

I: Indian/Native American Tribal Government (Federally Recognized)

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-20-06

* Title:

FY21 GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

1234-Map of Target Area.pdf

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

FY21 EPA Brownfields Community-Wide Assessment Grant for Clearwater River corridor Target Area, Nez Perce Tribe

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant 001-ID

* b. Program/Project 001-ID

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date: 10/01/2021

* b. End Date: 09/30/2024

18. Estimated Funding (\$):

* a. Federal	300,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	300,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Mr. * First Name: Shannon

Middle Name: F.

* Last Name: Wheeler

Suffix:

* Title: Chairman, Tribal Executive Committee

* Telephone Number: 208-843-7342 Fax Number:

* Email: nptec@nezperce.org

* Signature of Authorized Representative: Anthony Broncheau * Date Signed: 10/28/2020